

**From:** [James McKenna](#)  
**To:** [Chip Humphrey/R10/USEPA/US@EPA](#); [Eric Blischke/R10/USEPA/US@EPA](#)  
**Cc:** ['jworonets@anchoragea.com'](#); [Wyatt, Robert](#); ['pdost@pearllegalgroup.com'](#)  
**Subject:** URGENT: Latest information from Jay regarding the LRM  
**Date:** 12/15/2010 04:33 PM

---

*Chip and Eric:*

*It has come to our attention this afternoon that Jay Fields has acknowledged some significant statistical errors with his LRM. Namely, Jay indicated he discovered that he calculated positive likelihood ratios incorrectly, so his model is constructed with the wrong building blocks. Although Jay has already begun work to rebuild the model, it is uncertain to us how long this will take and what impact it will have on the overall benthic risk approach.*

*We are currently working under a dispute deadline of Friday, December 17<sup>th</sup>. Therefore, we see two options for moving this forward: a) EPA withdraws its directive for the LWG to use Jay's model; b) EPA provides an extension to the dispute deadline for continued evaluation by the LWG.*

*Obviously, any extension will have project schedule implications. Because it is unclear how much additional time it will take Jay to rebuild the model, and then for our team to review/assess the rebuilt model we strongly recommend EPA select option a).*

*We would like to discuss these options with you, and any other options you feel are worthy of consideration, later today or tomorrow morning. Please let us know when you are available to talk.*

Thanks,

Jim McKenna  
Verdant Solutions, LLC  
1519 SW Columbia Street  
Suite A  
Portland, OR 97201  
Office: (503) 477-5593  
Cell: (503) 309-1621  
[jim.mckenna@verdantllc.com](mailto:jim.mckenna@verdantllc.com)